

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Civil No. 10-14930

Honorable: Robert H. Cleland

Magistrate Judge: Mona Majzoub

ONE 2005 CHEVROLET CORVETTE,
VIN: 1G1YY34U655124061;
FIFTY THOUSAND SEVEN HUNDRED
FIFTY FOUR DOLLARS AND THIRTY SIX
CENTS (\$50,754.36) IN U.S. CURRENCY
FROM PUTNAM INVESTMENTS, OHIO
TRUST TUITION AUTHORITY EDUCATION
FUND ACCOUNT NOS. 3352-550567755 AND
3355-550567755; AND ASSORTED JEWELRY
(VALUED AT \$67,595),

Defendants *in rem*,

**STIPULATION FOR ENTRY OF ORDER STAYING
CIVIL FORFEITURE PROCEEDING**

WHEREAS, Plaintiff, the United States of America, and Claimants, Angela Jones-Payne and Lewis Payne each, by and through their undersigned attorney, hereby acknowledge that there is an ongoing criminal investigation involving Angela Jones-Payne and Lewis Payne that is related to this civil forfeiture case, therefore:

IT IS HEREBY STIPULATED AND AGREED that this civil forfeiture case be stayed pursuant to 18 U.S.C. §981(g)(1), or alternatively, 18 U.S.C. §981(g)(2), on the grounds that continuation of the civil proceeding may negatively impact one or more party in the manner described in the cited statutes; and that the stay continue during the pendency of the investigation and related criminal proceedings, if any, or until further order of the Court as provided in the accompanying Order without prejudice to any party to seek an advance termination or an

extension of the stay.

IT IS FURTHER STIPULATED AND AGREED that upon termination of the stay, the parties shall be afforded a reasonable time to file answers, conclude discovery, file dispositive motions, and file all witness lists prior to any pretrial or trial proceedings. No claims or defenses are waived as a result of the stay.

IT IS FURTHER STIPULATED AND AGREED that upon termination of the stay, the Court will set a scheduling conference.

Respectfully submitted,

BARBARA L. McQUADE
United States Attorney

S/TERRENCE J.L. THOMPSON
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, Michigan 48226
(313) 226-9694
terrence.thompson@usdoj.gov
(P72445)

Dated: January 7, 2011

S/JUAN A. MATEO (with consent)
Attorney for Angela Jones-Payne
535 Griswold, Suite 1030
Detroit, MI 48226
(313) 962-3500
mateoja@aol.com
(P33156)

Dated: January 7, 2011

S/GERALD K. EVELYN (with consent)
Attorney for Lewis Payne
535 Griswold, Suite 1030
Detroit, MI 48226
(313) 962-3500
geraldevelyn@yahoo.com
(P29182)

Dated: January 7, 2011

IT IS SO ORDERED:

S/Robert H. Cleland
ROBERT H. CLELAND
UNITED STATES DISTRICT JUDGE

Dated: January 18, 2011

I hereby certify that a copy of the foregoing document was mailed to counsel of record on this date, January 18, 2011, by electronic and/or ordinary mail.

S/Lisa Wagner
Case Manager and Deputy Clerk
(313) 234-5522